

MKM:TH F. #2017R01840

## **U.S. Department of Justice**

United States Attorney Eastern District of New York

271 Cadman Plaza East Brooklyn, New York 11201

July 12, 2021

## By ECF

The Honorable Nicholas G. Garaufis United States District Judge United States District Court 225 Cadman Plaza East Brooklyn, New York 11201

Re: United States v. Keith Raniere

Criminal Docket No. 18-204 (S-2) (NGG)

## Dear Judge Garaufis:

The government respectfully submits this letter to notify the Court regarding a potential conflict involving counsel for defendant Keith Raniere. On June 30, 2021 and July 2, 2021, Jeffrey H. Lichtman, Esq. and Marc A. Fernich, Esq. filed notices of appearance on behalf of the defendant Keith Raniere. The government has been advised that the legal fees for Mr. Lichtman and Mr. Fernich, who represent Raniere in connection with proceedings related to restitution before the Court as well as his pending appeal, are being paid by the defendant Clare Bronfman.

Raniere was previously advised of, and waived, a nearly identical potential conflict relating to Bronfman's payment of Raniere's legal fees, see ECF Docket Entry No. 443 (Curcio hearing relating to payment of legal fees by the CDF Irrevocable Trust). The government respectfully requests, in an abundance of caution, that the Court obtain the

defendant Keith Raniere's knowing and voluntary waiver of this potential conflict immediately prior to the sentencing hearing regarding restitution scheduled to proceed on July 20, 2021.

Respectfully submitted,

JACQUELYN M. KASULIS Acting United States Attorney

By: <u>/s/</u>

Tanya Hajjar Assistant U.S. Attorney (718) 254-7000

cc: Counsel of Record (by ECF and email)
United States Probation Officer Jennifer G. Fisher (by email)